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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

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**IN RE: ZIMMER NEXGEN KNEE  
IMPLANT PRODUCTS LIABILITY  
LITIGATION**

This Document Relates to:

HUGH GOLDSTON,

Plaintiff,

v.

ZIMMER, INC.; ZIMMER HOLDINGS,  
INC.; and ZIMMER ORTHOPAEDIC  
SURGICAL PRODUCTS, INC.,

Defendants.

**MDL NO. 2272**

**Master Docket Case No. 1:11-cv-05468**

**ALL CASES**

**JUDGE REBECCA PALLMEYER**

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**RULE 26(a)(1) INITIAL DISCLOSURES OF PLAINTIFF HUGH GOLDSTON**

Plaintiff Hugh Goldston, through his undersigned counsel, submits the following Initial Disclosure to the above-named defendants pursuant to Fed. R. Civ. P. 26(a)(1).

**I. Individuals and Entities Likely to Have Discoverable Information**

- a. Hugh Goldston, Plaintiff, 3722 W. Mapleleaf Way, West Jordan, Utah 84088;
- b. Gina Goldston, Plaintiff's wife, 3722 W. Mapleleaf Way, West Jordan, Utah 84088;

- c. Dr. Russell Sorensen, Orthopedic surgeon, 9844 South 1300 East, Suite 250, Sandy, Utah 84094;
- d. Dr. Summer McAllister, Family doctor, 1868 West 9800 South, Suite 100, South Jordan, Utah 84095;
- e. Dr. Heather Sojourner, Family doctor, 1868 West 9800 South, Suite 100, South Jordan, Utah 84095;
- f. Dr. Mark Reichman, Neurosurgeon, 370 9th Avenue, Suite 111, Salt Lake City, Utah 84013;
- g. Dr. Garner Meads, Otolaryngologist, 3584 West 9000 South, Suite 220, West Jordan, Utah 84088;
- h. Dr. Douglas Forshe, Dermatologist, 3570 West 9000 South, Suite 220, West Jordan, Utah 84088;
- i. Dr. Craig Van Leeuwen, Optometrist, 5770 South 250 East, Suite 410, Salt Lake City, Utah 84107;
- j. Alta View Hospital, 9660 South 1300 East, Sandy, Utah 84094; and
- k. St. Mark's Hospital, 1200 East 3900 South, Salt Lake City, Utah 84124

## **II. Medical Records**

HUGH GOLDSTON's medical records:

- a. Dr. Russell Sorensen, Orthopedic surgeon, 9844 South 1300 East, Suite 250, Sandy, Utah 84094;

b. Dr. Summer McAllister, Family doctor, 1868 West 9800 South, Suite 100, South Jordan, Utah 84095;

c. Dr. Heather Sojourner, Family doctor, 1868 West 9800 South, Suite 100, South Jordan, Utah 84095;

d. Dr. Mark Reichman, Neurosurgeon, 370 9th Avenue, Suite 111, Salt Lake City, Utah 84013;

e. Dr. Garner Meads, Otolaryngologist, 3584 West 9000 South, Suite 220, West Jordan, Utah 84088;

f. Dr. Douglas Forshe, Dermatologist, 3570 West 9000 South, Suite 220, West Jordan, Utah 84088;

g. Dr. Craig Van Leeuwen, Optometrist, 5770 South 250 East, Suite 410, Salt Lake City, Utah 84107;

h. Alta View Hospital, 9660 South 1300 East, Sandy, Utah 84094; and

i. St. Mark's Hospital, 1200 East 3900 South, Salt Lake City, Utah 84124

### **III. Computation of Damages**

a. All past and future medical expenses leading up to and including the revisions surgery and any complications thereafter relating to the knee, including but not limited to, hospitalizations, pre and post-operative surgeon visits, physical therapy, and radiation;

b. Past and future lost wages related to time off from work due to the revision surgery and the recovery thereafter. Lost earning capacity due to permanent injuries sustained as a result of the premature failure of the device;

c. Compensatory damages in an amount to be determined by a trier of fact at trial to compensate plaintiff for the pain and suffering he experienced as a result of the failed Zimmer device, of experiencing a revision surgery; and past, present, and future pain and suffering from permanent injuries caused by the defective Zimmer knee implant device; and

d. Punitive damages, attorneys' fees, and court costs, in amounts to be determined and/or proven at trial.

DATED this 17th day of May, 2012.

/s/ Douglas E. Griffith

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**CERTIFICATE OF SERVICE**

I certify that on May 17, 2012, I filed the foregoing **RULE 26(a)(1) INITIAL DISCLOSURES OF PLAINTIFF HUGH GOLDSTON** with the Clerk of the Court via CM/ECF, which CM/ECF system simultaneously provided service of the aforementioned document to all counsel of record and pro se parties who opted to receive service through such system.

/s/ Douglas E. Griffith

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